

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JAIME L. NATALI,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:12-cv-01281
)	JUDGE SHARP
WELLS FARGO BANK, NATIONAL)	Magistrate Judge Knowles
ASSOCIATION; SHIRLEE STEVENS;)	
AND DOES 1-20,)	
)	
Defendants.)	

DEFENDANTS' MOTION TO DISMISS COMPLAINT

Defendants Wells Fargo Bank, N.A. (“Wells Fargo”) and Shirlee Stevens (“Ms. Stevens”) (collectively “Defendants”), hereby move the Court for an order dismissing Plaintiff’s Complaint for failure to state a claim upon which relief can be granted. For the reasons more fully stated in the Defendants’ Memorandum in Support, Plaintiff has made nothing more than generic and conclusory allegations against the Defendants. Her Complaint, therefore, does not set forth facts sufficient to render Plaintiff’s claims plausible, as required by *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555 (2007) and *Ashcroft v. Iqbal*, 129 S.Ct. 1937 (2009). Because Plaintiff’s Complaint fails to meet the pleading requirements of Rule 8(a)(2) of the Federal Rules of Civil Procedure, the Court should dismiss Plaintiff’s claims in their entirety.

Respectfully submitted,

s/ Kenneth A. Weber
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of December 2012, a true and correct copy of Defendant's Motion to Dismiss Complaint was filed electronically via ECF, which will provide notice to the following parties:

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/s/ Kenneth A. Weber
Kenneth A. Weber